

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FREEPLAY MUSIC, LLC,

Plaintiff,

v.

CLUBE ATLÉTICO PARANAENSE,

Defendant.

Civil Action No. _____

**COMPLAINT AND
JURY DEMAND**

Plaintiff Freeplay Music, LLC (“FPM”), through its undersigned attorneys, Baker & Hostetler LLP, complains of defendant Clube Atlético Paranaense (“Defendant”):

Nature of the Action

1. By this complaint, FPM—a music publisher that has invested and risked money, time, and energy to develop its catalog of copyrights—seeks redress for Defendant’s copyright infringement. Defendant has been exploiting, without authorization, 132 of FPM’s copyrighted sound recordings and compositions by incorporating them into its promotional videos. Despite being on notice of its infringement, Defendant has refused to remedy its wrongdoing, leaving FPM no alternative but to bring this action.

Parties

2. FPM is a Delaware limited liability company, with a principle place of business in New York, New York.

3. Clube Atlético Paranaense (“CAP”) is a Brazilian association with an address at Rua Buenos Aires, n. 1270, Bairro Água Verde, 80250-070 Cidade de Curitiba, Estado do Paraná, Brazil.

Jurisdiction and Venue

4. FPM's claims arise under the Copyright Act, 17 U.S.C. § 101 *et seq.* Subject matter jurisdiction over this action is conferred upon this Court by 28 U.S.C. §§ 1331 and 1338.

5. Venue in this District is proper under 28 U.S.C. § 1391.

6. The Court has personal jurisdiction over Defendant because, upon information and belief, it derives substantial revenue from interstate commerce, conducts systematic and continuous business over the Internet, including through its highly interactive website, and has performed acts causing harm to FPM, including infringing copyrights belonging to FPM, a New York copyright holder, which give rise to this action.

FPM and Its Business

7. In 2001, Scott Schreer, one of America's most prolific and performed TV composers and producers, launched FPM, a high quality online music library. Schreer, whose credits include, among many others, the *NFL on Fox* theme, is also a contributing composer to a portion of FPM's catalogue.

8. FPM makes its catalogue available on its website. To download music, a user must obtain a license that corresponds to the user's use (i.e., personal, commercial, etc.). The cost of such license varies depending on use.

9. With over 200,000,000 impressions to its website as of 2013, FPM is one of the most widely trafficked production music libraries in the industry. Since August 2013, FPM has issued over 3.5 million licenses to the copyrighted music in its library.

10. When a user logs on to FPM's website, <http://www.freeplaymusic.com/>, the user is presented with a variety of choices and thousands of musical works (i.e., sound recordings and the underlying musical compositions), all of which are available for certain types of exploitation.

11. All use of FPM's music requires a license.

12. Until 2013, any exploitation of FPM's music "posted on a website" required a paid license. After July 2013, a user could obtain a free license to use certain music in FPM's catalogue on YouTube, provided it was for "personal use only."

13. At all times relevant, any "business use" of FPM's music has required a paid license. The uses complained of herein are business uses.

Defendant

14. Upon information and belief, Defendant is one of the largest soccer teams in Brazil.

15. CAP's website, Atleticoparanaense.com, is a commercial website.

16. Defendant uploaded the videos containing FPM's copyrighted music to the Internet for public access.

17. Defendant posted the videos at issue to the Internet for view by potential consumers, including those in New York.

18. Upon information and belief, Defendant promotes and markets itself and its products and services to its customers through videos. The videos are available online, including, but not limited to, the Internet site hosted by YouTube. Atleticoparanaense.com links a viewer directly to YouTube to view these videos.

19. In 2009, Defendant entered into a master recording/synchronization license agreement with FPM covering the non-broadcast multimedia use of four musical works not at issue here. The license has since expired, and is the only license agreement between the two parties.

The FPM Copyrights at Issue and Defendant's Unauthorized Exploitation

FPM's Copyrights

20. FPM is the owner of the registered copyrights (the "FPM Copyrights") in and to the musical compositions and sound recordings (the "FPM Copyrighted Music") set forth below:

- a. "Blue," covered by Registration No. SR 333-651 covering the collection *Alternative Rock Volume 1*.
- b. "Bouncing," covered by Registration No. SR 333-651 covering the collection *Alternative Rock Volume 1*.
- c. "Clear," covered by Registration No. SR 333-651 covering the collection *Alternative Rock Volume 1*.
- d. "Grunge Garage," covered by Registration No. SR 333-651 covering the collection *Alternative Rock Volume 1*.
- e. "Knife Fight," covered by Registration No. SR 333-651 covering the collection *Alternative Rock Volume 1*.
- f. "Misfit," covered by Registration No. SR 333-651 covering the collection *Alternative Rock Volume 1*.
- g. "Trudge," covered by Registration No. SR 333-651 covering the collection *Alternative Rock Volume 1*.
- h. "Abilene," covered by Registration No. SR 336-939 covering the collection *Blues Volume 1*.
- i. "Dixie Pickins," covered by Registration No. SR 336-939 covering the collection *Blues Volume 1*.
- j. "Uptown Blues," covered by Registration No. SR 336-939 covering the collection *Blues Volume 1*.
- k. "In Tune Today," covered by Registration No. SR 336-919 covering the collection *Broadcast Volume 1*.

- l. “Infoscape,” covered by Registration No. SR 336-919 covering the collection *Broadcast Volume 1*.
- m. “Need to Know,” covered by Registration No. SR 336-919 covering the collection *Broadcast Volume 1*.
- n. “PM Theme,” covered by Registration No. SR 336-919 covering the collection *Broadcast Volume 1*.
- o. “Pop News,” covered by Registration No. SR 336-919 covering the collection *Broadcast Volume 1*.
- p. “Sporting Update,” covered by Registration No. SR 336-919 covering the collection *Broadcast Volume 1*.
- q. “Three Day Bender,” covered by Registration No. SR 336-919 covering the collection *Broadcast Volume 1*.
- r. “TV Star Tonight,” covered by Registration No. SR 336-919 covering the collection *Broadcast Volume 1*.
- s. “Ticker Shock,” covered by Registration No. SR 333-636 covering the collection *Business and Finance Volume 1*.
- t. “From the Sky,” covered by Registration No. SR 333-636 covering the collection *Business and Finance Volume 1*.
- u. “Cry a River,” covered by Registration No. SR 337-057 covering the collection *Country Volume 1*.
- v. “Hold Up,” covered by Registration No. SR 382-040 covering the collection *Freeplay Music Corp./DVD #1*.
- w. “At You,” covered by Registration No. SR 382-040 covering the collection *Freeplay Music Corp./DVD #1*.
- x. “Halfback,” covered by Registration No. SR 382-040 covering the collection *Freeplay Music Corp./DVD #1*.
- y. “Shine,” covered by Registration No. SR 382-040 covering the collection *Freeplay Music Corp./DVD #1*.
- z. “Funk Ease,” covered by Registration No. SR 374-845 covering the collection *Freeplay Music Corp./DVD #2*.
- aa. “Conspiracy,” covered by Registration No. SR 374-845 covering the collection *Freeplay Music Corp./DVD #2*.

- bb. “I Wonder,” covered by Registration No. SR 374-912 covering the collection *Freeplay Music Corp./DVD #3*.
- cc. “Impaction,” covered by Registration No. SR 374-911 covering the collection *Freeplay Music Corp./DVD #4*.
- dd. “Dirty Dogs & Road Hogs,” covered by Registration No. SR 374-911 covering the collection *Freeplay Music Corp./DVD #4*.
- ee. “Moms on a Mission,” covered by Registration No. SR 374-911 covering the collection *Freeplay Music Corp./DVD #4*.
- ff. “Kyrie,” covered by Registration No. SR 374-911 covering the collection *Freeplay Music Corp./DVD #4*.
- gg. “Rock All Night” (retitled from “Up All Night”), covered by Registration No. SR 374-911 covering the collection *Freeplay Music Corp./DVD #4*.
- hh. “Countdown,” covered by Registration No. SR 374-911 covering the collection *Freeplay Music Corp./DVD #4*.
- ii. “Chasin’ After Tracy,” covered by Registration No. SR 378-924 covering the collection *Freeplay Music Corp./DVD #5*.
- jj. “Cracking Up,” covered by Registration No. SR 378-924 covering the collection *Freeplay Music Corp./DVD #5*.
- kk. “Her Majesty,” covered by Registration No. SR 386-596 covering the collection *Freeplay Music Corp./DVD #6*.
- ll. “Sir Robin of Locksley,” covered by Registration No. SR 386-596 covering the collection *Freeplay Music Corp./DVD #6*.
- mm. “Coming Home,” covered by Registration No. SR 374-914 covering the collection *Freeplay Music Corp./DVD #7*.
- nn. “Kickin’ It,” covered by Registration No. SR 374-914 covering the collection *Freeplay Music Corp./DVD #7*.
- oo. “Sneak Attack,” covered by Registration No. SR 374-914 covering the collection *Freeplay Music Corp./DVD #7*.
- pp. “Reach for the Sky,” covered by Registration No. SR 374-914 covering the collection *Freeplay Music Corp./DVD #7*.
- qq. “Close Encounters,” covered by Registration No. SR 374-914 covering the collection *Freeplay Music Corp./DVD #7*.

- rr. “Eye Spy,” covered by Registration No. SR 374-914 covering the collection *Freeplay Music Corp./DVD #7*.
- ss. “Bang Through,” covered by Registration No. SR 374-914 covering the collection *Freeplay Music Corp./DVD #7*.
- tt. “Danger Approaches,” covered by Registration No. SR 374-914 covering the collection *Freeplay Music Corp./DVD #7*.
- uu. “Chrome,” covered by Registration No. SR 374-913 covering the collection *Freeplay Music Corp./DVD #8*.
- vv. “Bounty,” covered by Registration No. SR 374-913 covering the collection *Freeplay Music Corp./DVD #8*.
- ww. “Have a Rastaday,” covered by Registration No. SR 374-913 covering the collection *Freeplay Music Corp./DVD #8*.
- xx. “A Question of Why,” covered by Registration No. SR 396-282 covering the collection *Freeplay Music Corp./DVD #9*.
- yy. “As Nasty,” covered by Registration No. SR 411-915 covering the collection *Freeplay Music Corp./DVD #10*.
- zz. “Opposites React,” covered by Registration No. SR 411-915 covering the collection *Freeplay Music Corp./DVD #10*.
- aaa. “Mug Shot,” covered by Registration No. SR 406-235 covering the collection *Freeplay Music Corp./DVD #11*.
- bbb. “Burn Out,” covered by Registration No. SR 406-235 covering the collection *Freeplay Music Corp./DVD #11*.
- ccc. “Bad Road,” covered by Registration No. SR 337-144 covering the collection *Hard Rock Volume 1*.
- ddd. “Bomp,” covered by Registration No. SR 337-144 covering the collection *Hard Rock Volume 1*.
- eee. “Head Them Up,” covered by Registration No. SR 337-144 covering the collection *Hard Rock Volume 1*.
- fff. “Rough Rouge” (retitled from “Lipstick and Leather”), covered by Registration No. SR 337-144 covering the collection *Hard Rock Volume 1*.
- ggg. “Uncivilized,” covered by Registration No. SR 337-144 covering the collection *Hard Rock Volume 1*.

- hhh. “Whiskey Breath,” covered by Registration No. SR 337-144 covering the collection *Hard Rock Volume 1*.
- iii. “Wild Child,” covered by Registration No. SR 337-144 covering the collection *Hard Rock Volume 1*.
- jjj. “Old School Party,” covered by Registration No. SR 337-216 covering the collection *Hip Hop Volume 1*.
- kkk. “Tie Her Down,” covered by Registration No. SR 337-216 covering the collection *Hip Hop Volume 1*.
- lll. “You Need My Help,” covered by Registration No. SR 337-216 covering the collection *Hip Hop Volume 1*.
- mmm. “Old Skool,” covered by Registration No. SR 335-614 covering the collection *Hip Hop Volume 2*.
- nnn. “Acid Indigestion,” covered by Registration No. SR 335-678 covering the collection *Hot Guitar Rock Volume 1*.
- ooo. “Big Gunns,” covered by Registration No. SR 337-199 covering the collection *Hot Guitar Rock Volume 2*.
- ppp. “Happy Dudes,” covered by Registration No. SR 337-199 covering the collection *Hot Guitar Rock Volume 2*.
- qqq. “Cacaphony,” covered by Registration No. SR 337-199 covering the collection *Hot Guitar Rock Volume 2*.
- rrr. “Minority,” covered by Registration No. SR 337-199 covering the collection *Hot Guitar Rock Volume 2*.
- sss. “Monkey Bidness,” covered by Registration No. SR 337-199 covering the collection *Hot Guitar Rock Volume 2*.
- ttt. “Pump Handle,” covered by Registration No. SR 337-199 covering the collection *Hot Guitar Rock Volume 2*.
- uuu. “Repeater,” covered by Registration No. SR 337-199 covering the collection *Hot Guitar Rock Volume 2*.
- vvv. “Roto Rock,” covered by Registration No. SR 337-199 covering the collection *Hot Guitar Rock Volume 2*.
- www. “Techno Bone,” covered by Registration No. SR 337-199 covering the collection *Hot Guitar Rock Volume 2*.

- xxx. “Fembot Caress,” covered by Registration No. SR 335-613 covering the collection *Just the News Volume 1*.
- yyy. “International Current,” covered by Registration No. SR 335-613 covering the collection *Just the News Volume 1*.
- zzz. “Night Watch,” covered by Registration No. SR 335-613 covering the collection *Just the News Volume 1*.
- aaaa. “November News,” covered by Registration No. SR 335-613 covering the collection *Just the News Volume 1*.
- bbbb. “The Story,” covered by Registration No. SR 335-613 covering the collection *Just the News Volume 1*.
- cccc. “Floor Sample,” covered by Registration No. SR 334-609 covering the collection *Lounge Volume 1*.
- dddd. “Funny Ways,” covered by Registration No. SR 633-492 covering the collection *Modern Rock Volume 3*.
- eeee. “Victory Planet,” covered by Registration No. SR 333-631 covering the collection *Motivational Volume 1*.
- ffff. “Hard to Hold,” covered by Registration No. SR 335-719 covering the collection *Pop Volume 1*.
- gggg. “Flash,” covered by Registration No. SR 335-719 covering the collection *Pop Volume 1*.
- hhhh. “Four AM,” covered by Registration No. SR 337-205 covering the collection *Pop Volume 2*.
- iiii. “When You Get Home,” covered by Registration No. SR 337-205 covering the collection *Pop Volume 2*.
- jjjj. “Evil Deed,” covered by Registration No. SR 336-934 covering the collection *Sports Extreme Volume 1*.
- kkkk. “Extreme Team,” covered by Registration No. SR 336-934 covering the collection *Sports Extreme Volume 1*.
- llll. “Wicked Hill,” covered by Registration No. SR 336-934 covering the collection *Sports Extreme Volume 1*.
- mmmm. “Mean Theme,” covered by Registration No. SR 336-934 covering the collection *Sports Extreme Volume 1*.

- nnnn. “Bolo Punch,” covered by Registration No. SR 335-543 covering the collection *Sports Extreme Volume 2*.
- oooo. “Amplife,” covered by Registration No. SR 335-543 covering the collection *Sports Extreme Volume 2*.
- pppp. “Downhill,” covered by Registration No. SR 335-543 covering the collection *Sports Extreme Volume 2*.
- qqqq. “Kick In,” covered by Registration No. SR 335-543 covering the collection *Sports Extreme Volume 2*.
- rrrr. “Fast Cut,” covered by Registration No. SR 335-543 covering the collection *Sports Extreme Volume 2*.
- ssss. “First Round Knockout,” covered by Registration No. SR 335-543 covering the collection *Sports Extreme Volume 2*.
- tttt. “Power Punch,” covered by Registration No. SR 335-543 covering the collection *Sports Extreme Volume 2*.
- uuuu. “Weird Trip,” covered by Registration No. SR 337-058 covering the collection *Sports Highlights Volume 1*.
- vvvv. “Give Me the Ball,” covered by Registration No. SR 337-058 covering the collection *Sports Highlights Volume 1*.
- www. “Pigskin Highlight,” covered by Registration No. SR 337-058 covering the collection *Sports Highlights Volume 1*.
- xxxx. “Kick It Up,” covered by Registration No. SR 337-058 covering the collection *Sports Highlights Volume 1*.
- yyyy. “Steam,” covered by Registration No. SR 337-058 covering the collection *Sports Highlights Volume 1*.
- zzzz. “Surf Avenue,” covered by Registration No. SR 337-058 covering the collection *Sports Highlights Volume 1*.
- aaaa. “Against the Grain,” covered by Registration No. SR 336-918 covering the collection *Sports Highlights Volume 2*.
- bbbb. “Down and Dirty,” covered by Registration No. SR 336-918 covering the collection *Sports Highlights Volume 2*.
- cccc. “Mean Machine,” covered by Registration No. SR 336-918 covering the collection *Sports Highlights Volume 2*.

- ddddd. “That Hurts,” covered by Registration No. SR 336-918 covering the collection *Sports Highlights Volume 2*.
- eeee. “Hit Squad,” covered by Registration No. SR 336-918 covering the collection *Sports Highlights Volume 2*.
- ffff. “The Vanquished,” covered by Registration No. SR 336-918 covering the collection *Sports Highlights Volume 2*.
- ggggg. “You Too As Well,” covered by Registration No. SR 337-221 covering the collection *Sports Highlights Vol. 3*.
- hhhhh. “Downhill Blitz,” covered by Registration No. SR 335-537 covering the collection *Sports Promos Volume 1*.
- iiii. “Funk Button,” covered by Registration No. SR 335-537 covering the collection *Sports Promos Volume 1*.
- jjjj. “Breakaway,” covered by Registration No. SR 335-537 covering the collection *Sports Promos Volume 1*.
- kkkkk. “Snowblind,” covered by Registration No. SR 335-537 covering the collection *Sports Promos Volume 1*.
- llll. “Desk Report,” covered by Registration No. SR 337-061 covering the collection *Sports Themes Volume 1*.
- mmmmm. “Fooling,” covered by Registration No. SR 337-061 covering the collection *Sports Themes Volume 1*.
- nnnnn. “Devil Ride,” covered by Registration No. SR 337-061 covering the collection *Sports Themes Volume 1*.
- oooo. “Coliseum,” covered by Registration No. SR 337-061 covering the collection *Sports Themes Volume 1*.
- ppppp. “Power Theme,” covered by Registration No. SR 337-061 covering the collection *Sports Themes Volume 1*.
- qqqqq. “Funky Dunky,” covered by Registration No. SR 333-635 covering the collection *TV Themes Vol 1*.
- rrrrr. “Cappacino,” covered by Registration No. SR 333-635 covering the collection *TV Themes Vol 1*.
- sssss. “Far Away,” covered by Registration No. SR 333-635 covering the collection *TV Themes Vol 1*.

- ttttt. “Ocean Motion,” covered by Registration No. SR 333-635 covering the collection *TV Themes Vol 1*.
- uuuuu. “Straight From the Heart,” covered by Registration No. SR 333-635 covering the collection *TV Themes Vol 1*.
- vvvvv. “For the Gold,” covered by Registration No. SR 335-926 covering the collection *Victory Grand Volume 1*.
- wwwww. “Gold,” covered by Registration No. SR 335-926 covering the collection *Victory Grand Volume 1*.
- xxxxx. “The Opening,” covered by Registration No. SR 335-926 covering the collection *Victory Grand Volume 1*.
- yyyyy. “Wings of the Wind,” covered by Registration No. SR 335-926 covering the collection *Victory Grand Volume 1*.
- zzzzz. “Out in the Fields,” covered by Registration No. SR 337-206 covering the collection *World Mix Vol. 1*.
- aaaaa. “Quest,” covered by Registration No. SR 336-935 covering the collection *World Mix Vol. 2*.
- bbbbb. “Determined Tumbao,” covered by Registration No. SR 335-708 covering the collection *World Mix Vol. 5*.

Defendant’s Unlicensed Use of the Music Copyrights

- 21. Defendant has engaged in at least 307 uses of the FPM Copyrights, including:
 - a. FPM’s copyrighted musical work “Blue” is exploited on the following website:
<http://www.youtube.com/watch?v=oRswK3rLwQQ>.
 - b. FPM’s copyrighted musical work “Bouncing” is exploited on the following websites:
<http://www.youtube.com/watch?v=anQ06JymSNs>;
http://www.youtube.com/watch?v=U3wRkNG_tp0;
<http://www.youtube.com/watch?v=qI26xhgAJL8>;
<http://www.youtube.com/watch?v=wPMg-qaR9kw>;
http://www.youtube.com/watch?v=YnSY_1czJOY.
 - c. FPM’s copyrighted musical work “Clear” is exploited on the following websites:
<http://www.youtube.com/watch?v=oRswK3rLwQQ>;
<http://www.youtube.com/watch?v=UMXUHxLRuf0>.
 - d. FPM’s copyrighted musical work “Grunge Garage” is exploited on the following websites: <http://www.youtube.com/watch?v=7PdIWc6wyzI>;
<http://www.youtube.com/watch?v=DCJ7cHO4p04>;

<http://www.youtube.com/watch?v=F4g6-z4fXgk>;
<http://www.youtube.com/watch?v=seaVCyVtWKw>;
<http://www.youtube.com/watch?v=UMXUHxLRuf0>.

- e. FPM's copyrighted musical work "Knife Fight" is exploited on the following websites:
<http://www.youtube.com/watch?v=Sm6AxeOH5XI>;
<http://www.youtube.com/watch?v=-i2C1zHAfA0>.
- f. FPM's copyrighted musical work "Misfit" is exploited on the following website:
http://www.youtube.com/watch?v=YnSY_1czJOY.
- g. FPM's copyrighted musical work "Trudge" is exploited on the following websites:
<http://www.youtube.com/watch?v=anQ06JymSNs>
<http://www.youtube.com/watch?v=SXIWMV1Qk1A>.
- h. FPM's copyrighted musical work "Abilene" is exploited on the following website:
<http://www.youtube.com/watch?v=-nY13Ds3Vro>.
- i. FPM's copyrighted musical work "Dixie Pickins" is exploited on the following website:
<http://www.youtube.com/watch?v=-nY13Ds3Vro>.
- j. FPM's copyrighted musical work "Uptown Blues" is exploited on the following website: <http://www.youtube.com/watch?v=ctn7I-2JeBY>.
- k. FPM's copyrighted musical work "In Tune Today" is exploited on the following websites:
<http://www.youtube.com/watch?v=anQ06JymSNs>;
<http://www.youtube.com/watch?v=2jmErfO5tdo>;
<http://www.youtube.com/watch?v=DCoyi9fy1UM>;
http://www.youtube.com/watch?v=SYX_7DCq9J8.
- l. FPM's copyrighted musical work "Infoscape" is exploited on the following websites:
<http://www.youtube.com/watch?v=ikuqBH1QBqI>;
http://www.youtube.com/watch?v=JC_cAu1-WHM.
- m. FPM's copyrighted musical work "Need to Know" is exploited on the following websites:
http://www.youtube.com/watch?v=JC_cAu1-WHM;
<http://www.youtube.com/watch?v=bFZQrrZ-8vQ>.
- n. FPM's copyrighted musical work "PM Theme" is exploited on the following websites:
<http://www.youtube.com/watch?v=O7enUKJRMMyQ>;
http://www.youtube.com/watch?v=qJA2no_OLjk;
<http://www.youtube.com/watch?v=ctn7I-2JeBY>.
- o. FPM's copyrighted musical work "Pop News" is exploited on the following websites:
<http://www.youtube.com/watch?v=O7enUKJRMMyQ>;
<http://www.youtube.com/watch?v=JvPzYnhLZsk>.

- p. FPM's copyrighted musical work "Sporting Update" is exploited on the following website: <http://www.youtube.com/watch?v=30IDYAiTC44>.
- q. FPM's copyrighted musical work "Three Day Bender" is exploited on the following website: <http://www.youtube.com/watch?v=ikuqBH1QBqI>.
- r. FPM's copyrighted musical work "TV Star Tonight" is exploited on the following website: <http://www.youtube.com/watch?v=ctn7I-2JeBY>.
- s. FPM's copyrighted musical work "Ticker Shock" is exploited on the following websites: <http://www.youtube.com/watch?v=1vQJoZD72Y8>;
http://www.youtube.com/watch?v=FC1rjOUYx_E;
<http://www.youtube.com/watch?v=4wi3ceGS9Bk>;
<http://www.youtube.com/watch?v=8p7nd6yD428>;
<http://www.youtube.com/watch?v=cszSIpUdEJc>;
<http://www.youtube.com/watch?v=LkCEzMSbWHM>.
- t. FPM's copyrighted musical work "From the Sky" is exploited on the following websites: <http://www.youtube.com/watch?v=SXIWMV1Qk1A>;
<http://www.youtube.com/watch?v=yK8DD-0M2qo>.
- u. FPM's copyrighted musical work "Cry a River" is exploited on the following website: http://www.youtube.com/watch?v=IT-D_jLaezg.
- v. FPM's copyrighted musical work "Hold Up" is exploited on the following website: <http://www.youtube.com/watch?v=qbF4Zh1Wi1I>.
- w. FPM's copyrighted musical work "At You" is exploited on the following website: <http://www.youtube.com/watch?v=wJzvzjGMOQs>.
- x. FPM's copyrighted musical work "Halfback" is exploited on the following website: <http://www.youtube.com/watch?v=ikuqBH1QBqI>.
- y. FPM's copyrighted musical work "Shine" is exploited on the following website: <http://www.youtube.com/watch?v=SLwRl3Ced2g>.
- z. FPM's copyrighted musical work "Funk Ease" is exploited on the following websites: <http://www.youtube.com/watch?v=AXiyQzOpJ3E>;
http://www.youtube.com/watch?v=O3tcUEH8n_A.
- aa. FPM's copyrighted musical work "Conspiracy" is exploited on the following website: <http://www.youtube.com/watch?v=Ypuq4bQhZRw>.
- bb. FPM's copyrighted musical work "I Wonder" is exploited on the following website: <http://www.youtube.com/watch?v=stp7D5ZutHs>.
- cc. FPM's copyrighted musical work "Impaction" is exploited on the following website: <http://www.youtube.com/watch?v=wJzvzjGMOQs>.

- dd. FPM's copyrighted musical work "Dirty Dogs & Road Hogs" is exploited on the following website: [http://www.youtube.com/watch?v=kkGfHdK6rgo](http://www.youtube.com/watch?v=kkGfHdK6rgo;);
- ee. FPM's copyrighted musical work "Moms on a Mission" is exploited on the following websites: <http://www.youtube.com/watch?v=sIF7p0ID9xw>;
<http://www.youtube.com/watch?v=TAr9dToqHuU>.
- ff. FPM's copyrighted musical work "Kyrie" is exploited on the following website:
<http://www.youtube.com/watch?v=kkGfHdK6rgo>.
- gg. FPM's copyrighted musical work "Rock All Night" is exploited on the following website: <http://www.youtube.com/watch?v=ca6FUSkJL88>.
- hh. FPM's copyrighted musical work "Countdown" is exploited on the following website:
<http://www.youtube.com/watch?v=wJzvzjGMOQs>.
- ii. FPM's copyrighted musical work "Chasin' After Tracy" is exploited on the following website: <http://www.youtube.com/watch?v=bpRJLX6EaGc>.
- jj. FPM's copyrighted musical work "Cracking Up" is exploited on the following websites:
<http://www.youtube.com/watch?v=bpRJLX6EaGc>;
<http://www.youtube.com/watch?v=kkGfHdK6rgo>.
- kk. FPM's copyrighted musical work "Her Majesty" is exploited on the following websites:
<http://www.youtube.com/watch?v=8Bax9-FfGkM>;
<http://www.youtube.com/watch?v=agYMk04VBDo>.
- ll. FPM's copyrighted musical work "Sir Robin of Locksley" is exploited on the following website: <http://www.youtube.com/watch?v=Oy5AwjI-4B8>.
- mm. FPM's copyrighted musical work "Coming Home" is exploited on the following website: <http://www.youtube.com/watch?v=vIW5IcS7UKE>.
- nn. FPM's copyrighted musical work "Kickin' It" is exploited on the following website:
<http://www.youtube.com/watch?v=cLov-VTOGus>.
- oo. FPM's copyrighted musical work "Sneak Attack" is exploited on the following website:
<http://www.youtube.com/watch?v=q-f7W0wEqUk>.
- pp. FPM's copyrighted musical work "Reach for the Sky" is exploited on the following website: <http://www.youtube.com/watch?v=21OU0RsNMio>.
- qq. FPM's copyrighted musical work "Close Encounters" is exploited on the following websites: <http://www.youtube.com/watch?v=0osR-i21PxU>;
<http://www.youtube.com/watch?v=2jYRNmTZ820>;
<http://www.youtube.com/watch?v=FG1IHMcXjGM>;
<http://www.youtube.com/watch?v=JO709KiwA1o>;

- <http://www.youtube.com/watch?v=KDVCj4hvFRs>;
<http://www.youtube.com/watch?v=sp4vDLR5XMo>.
- rr. FPM's copyrighted musical work "Eye Spy" is exploited on the following website:
<http://www.youtube.com/watch?v=q-f7W0wEqUk>.
- ss. FPM's copyrighted musical work "Bang Through" is exploited on the following website: <http://www.youtube.com/watch?v=cLov-VTOGus>.
- tt. FPM's copyrighted musical work "Danger Approaches" is exploited on the following website: <http://www.youtube.com/watch?v=cLov-VTOGus>.
- uu. FPM's copyrighted musical work "Chrome" is exploited on the following website:
<http://www.youtube.com/watch?v=pe4JRTgHwdM>.
- vv. FPM's copyrighted musical work "Bounty" is exploited on the following website:
<http://www.youtube.com/watch?v=38M7sRb-9yo>.
- ww. FPM's copyrighted musical work "Have a Rastaday" is exploited on the following websites: <http://www.youtube.com/watch?v=BVAqD1xYcP4>;
<http://www.youtube.com/watch?v=RTPaDs6Xiro>.
- xx. FPM's copyrighted musical work "A Question of Why" is exploited on the following website: <http://www.youtube.com/watch?v=DNUo9N1ldCk>.
- yy. FPM's copyrighted musical work "As Nasty" is exploited on the following website:
<http://www.youtube.com/watch?v=VBog7CfLc9Y>.
- zz. FPM's copyrighted musical work "Opposites React" is exploited on the following website: <http://www.youtube.com/watch?v=CMb-PV8M4s4>.
- aaa. FPM's copyrighted musical work "Mug Shot" is exploited on the following website: <http://www.youtube.com/watch?v=seaVCyVtWKw>.
- bbb. FPM's copyrighted musical work "Burn Out" is exploited on the following website: <http://www.youtube.com/watch?v=RRf6Az16YhM>.
- ccc. FPM's copyrighted musical work "Bad Road" is exploited on the following websites: <http://www.youtube.com/watch?v=AeKcTltL-c0>;
<http://www.youtube.com/watch?v=qwI2rrC2oSg>;
<http://www.youtube.com/watch?v=UMXUHxLRuf0>;
<http://www.youtube.com/watch?v=Vdngpjo4cUA>.
- ddd. FPM's copyrighted musical work "Bomp" is exploited on the following websites:
<http://www.youtube.com/watch?v=qwI2rrC2oSg>;
<http://www.youtube.com/watch?v=BLkXt1pHkgs>.

- eee. FPM's copyrighted musical work "Head Them Up" is exploited on the following website: <http://www.youtube.com/watch?v=ljHAT9JgPW4>.
- fff. FPM's copyrighted musical work "Rough Rouge" is exploited on the following websites: http://www.youtube.com/watch?v=9Z_ItdDeloo;
<http://www.youtube.com/watch?v=ZtJsDNKZc3g>.
- ggg. FPM's copyrighted musical work "Uncivilized" is exploited on the following websites: <http://www.youtube.com/watch?v=JO709KiwA1o>;
<http://www.youtube.com/watch?v=ljHAT9JgPW4>.
- hhh. FPM's copyrighted musical work "Whiskey Breath" is exploited on the following website: <http://www.youtube.com/watch?v=yK8DD-0M2qo>.
- iii. FPM's copyrighted musical work "Wild Child" is exploited on the following websites: <http://www.youtube.com/watch?v=hFvh4DUkDv0>;
<http://www.youtube.com/watch?v=BLkXt1pHkgs>;
<http://www.youtube.com/watch?v=GK5x6KfDudg>.
- jjj. FPM's copyrighted musical work "Old School Party" is exploited on the following websites: <http://www.youtube.com/watch?v=Av8xgGwC8Zc>;
<http://www.youtube.com/watch?v=hzBk3KEor9E>.
- kkk. FPM's copyrighted musical work "Tie Her Down" is exploited on the following website: <http://www.youtube.com/watch?v=JgD1c6Cua5E>.
- lll. FPM's copyrighted musical work "You Need My Help" is exploited on the following website: http://www.youtube.com/watch?v=LxfEz-_qUu8.
- mmm. FPM's copyrighted musical work "Old Skool" is exploited on the following website: <http://www.youtube.com/watch?v=21g2cqLVmTU>.
- nnn. FPM's copyrighted musical work "Acid Indigestion" is exploited on the following website: http://www.youtube.com/watch?v=n_albEH5IM4.
- ooo. FPM's copyrighted musical work "Big Gunns" is exploited on the following websites: <http://www.youtube.com/watch?v=2DLTi739bHU>;
<http://www.youtube.com/watch?v=GIQC9xXB0HM>;
<http://www.youtube.com/watch?v=pabWJcQFx2k>;
<http://www.youtube.com/watch?v=qW8X3-R3wj4>;
<http://www.youtube.com/watch?v=RNsimpur6QQ>;
<http://www.youtube.com/watch?v=tWGEgn9w2ck>.
- ppp. FPM's copyrighted musical work "Happy Dudes" is exploited on the following websites: <http://www.youtube.com/watch?v=3EHNXkKGkig>;
<http://www.youtube.com/watch?v=E8J4MiiNqr8>.

- qqq. FPM's copyrighted musical work "Cacaphony" is exploited on the following website: <http://www.youtube.com/watch?v=y6yQOnQ3BLg>.
- rrr. FPM's copyrighted musical work "Minority" is exploited on the following websites: <http://www.youtube.com/watch?v=aukI3qycP5s>;
http://www.youtube.com/watch?v=d_EyRU1Js0g.
- sss. FPM's copyrighted musical work "Monkey Bidness" is exploited on the following websites: <http://www.youtube.com/watch?v=16xlcZkilRk>;
<http://www.youtube.com/watch?v=z6DKYVFzaLY>;
http://www.youtube.com/watch?v=Z6QG_reKqGQ.
- ttt. FPM's copyrighted musical work "Pump Handle" is exploited on the following websites: http://www.youtube.com/watch?v=Z6QG_reKqGQ;
<http://www.youtube.com/watch?v=jT1yfqelOU0>;
http://www.youtube.com/watch?v=q_O1c8u-2IM.
- uuu. FPM's copyrighted musical work "Repeater" is exploited on the following websites: <http://www.youtube.com/watch?v=TA9dToqHuU>;
<http://www.youtube.com/watch?v=ulw867aI2v4>;
<http://www.youtube.com/watch?v=WqclzBKPBT>E.
- vvv. FPM's copyrighted musical work "Roto Rock" is exploited on the following websites: <http://www.youtube.com/watch?v=b2IN370ScCM>;
<http://www.youtube.com/watch?v=bCsaqPr4xIM>;
<http://www.youtube.com/watch?v=Rhm7ig86bZk>.
- www. FPM's copyrighted musical work "Techno Bone" is exploited on the following website: http://www.youtube.com/watch?v=qJA2no_OLjk.
- xxx. FPM's copyrighted musical work "Fembot Caress" is exploited on the following website: <http://www.youtube.com/watch?v=k1cvJP3UjT8>.
- yyy. FPM's copyrighted musical work "International Current" is exploited on the following website: <http://www.youtube.com/watch?v=tQUJdyVnIwI>.
- zzz. FPM's copyrighted musical work "Night Watch" is exploited on the following website: <http://www.youtube.com/watch?v=tQUJdyVnIwI>.
- aaaa. FPM's copyrighted musical work "November News" is exploited on the following websites: <http://www.youtube.com/watch?v=tQUJdyVnIwI>
<http://www.youtube.com/watch?v=H7DHQUgfdD8>.
- bbbb. FPM's copyrighted musical work "The Story" is exploited on the following websites: <http://www.youtube.com/watch?v=qW8X3-R3wj4>;
<http://www.youtube.com/watch?v=UMXUHxLRuf0>;
<http://www.youtube.com/watch?v=wbIP9GcYcu0>.

- cccc. FPM's copyrighted musical work "Floor Sample" is exploited on the following website: <http://www.youtube.com/watch?v=5Vh4KiohHsE>.
- dddd. FPM's copyrighted musical work "Funny Ways" is exploited on the following websites: <http://www.youtube.com/watch?v=IUQupG-qgbk>;
<http://www.youtube.com/watch?v=21g2cqLVmTU>;
<http://www.youtube.com/watch?v=44HFr-k-ws0>;
<http://www.youtube.com/watch?v=AJeeMxQHTzs>;
<http://www.youtube.com/watch?v=BVAqD1xYcP4>;
<http://www.youtube.com/watch?v=Ci9ZfYpkBEg>;
<http://www.youtube.com/watch?v=CMb-PV8M4s4>;
<http://www.youtube.com/watch?v=DK2q2xph8ms>;
<http://www.youtube.com/watch?v=E8J4MiiNqr8>;
<http://www.youtube.com/watch?v=F4g6-z4fXgk>;
http://www.youtube.com/watch?v=fIA81fOW_JQ;
<http://www.youtube.com/watch?v=nG463LHWnwo>;
<http://www.youtube.com/watch?v=Nty43v8OJDc>;
<http://www.youtube.com/watch?v=pRj7o27Vn1c>;
<http://www.youtube.com/watch?v=qYZ5pPuyuCW>;
<http://www.youtube.com/watch?v=RTPaDs6Xiro>;
<http://www.youtube.com/watch?v=seaVCyVtWKw>;
<http://www.youtube.com/watch?v=SNO4GNdmukY>;
<http://www.youtube.com/watch?v=stp7D5ZutHs>;
<http://www.youtube.com/watch?v=SwZmtwxewwQ>;
<http://www.youtube.com/watch?v=VaPlhh-dlNk>;
<http://www.youtube.com/watch?v=vIW5IcS7UKE>;
<http://www.youtube.com/watch?v=VqcRC0EVPJw>;
<http://www.youtube.com/watch?v=w3kUQ96pnm0>;
<http://www.youtube.com/watch?v=wadFyESECTI>;
http://www.youtube.com/watch?v=Z6QG_reKqGQ.
- eeee. FPM's copyrighted musical work "Victory Planet" is exploited on the following website: <http://www.youtube.com/watch?v=wbIP9GcYcu0>.
- ffff. FPM's copyrighted musical work "Hard to Hold" is exploited on the following website: <http://www.youtube.com/watch?v=0YMRZv-KipI>.
- gggg. FPM's copyrighted musical work "Flash" is exploited on the following website: http://www.youtube.com/watch?v=6Un8h3R_yY4.
- hhhh. FPM's copyrighted musical work "Four AM" is exploited on the following websites: <http://www.youtube.com/watch?v=DK2q2xph8ms>
<http://www.youtube.com/watch?v=VaPlhh-dlNk>.
- iiii. FPM's copyrighted musical work "When You Get Home" is exploited on the following websites: <http://www.youtube.com/watch?v=1bQXpTx-tek>;
<http://www.youtube.com/watch?v=CB0TpFSMUaQ>.

- jjjj. FPM's copyrighted musical work "Evil Deed" is exploited on the following websites: <http://www.youtube.com/watch?v=UMXUHxLRuf0>;
<http://www.youtube.com/watch?v=vEHQhcLl5G4>.
- kkkk. FPM's copyrighted musical work "Extreme Team" is exploited on the following website: <http://www.youtube.com/watch?v=vEHQhcLl5G4>.
- llll. FPM's copyrighted musical work "Wicked Hill" is exploited on the following websites: http://www.youtube.com/watch?v=bu_yN1GASMI;
<http://www.youtube.com/watch?v=V8YQNTiAgxE>;
<http://www.youtube.com/watch?v=5rnOG9zdTtU>.
- mmmm. FPM's copyrighted musical work "Mean Theme" is exploited on the following website: <http://www.youtube.com/watch?v=B0nFBWhDtLU>.
- nnnn. FPM's copyrighted musical work "Bolo Punch" is exploited on the following websites: <http://www.youtube.com/watch?v=B0nFBWhDtLU>;
<http://www.youtube.com/watch?v=CSAdAPYm1yo>;
<http://www.youtube.com/watch?v=I5KiZIZDZhQ>;
<http://www.youtube.com/watch?v=p0NRYDf9yKA>.
- oooo. FPM's copyrighted musical work "Amplife" is exploited on the following website: <http://www.youtube.com/watch?v=vEHQhcLl5G4>.
- pppp. FPM's copyrighted musical work "Downhill" is exploited on the following websites: <http://www.youtube.com/watch?v=bzUzrtJPx84>;
<http://www.youtube.com/watch?v=FnIQSXo2ucc>;
<http://www.youtube.com/watch?v=IrtDd1HeUMs>;
<http://www.youtube.com/watch?v=YF8EdML04f8>;
<http://www.youtube.com/watch?v=yhMCNdGzxBk>.
- qqqq. FPM's copyrighted musical work "Kick In" is exploited on the following websites: <http://www.youtube.com/watch?v=wB32LIN7ldo>;
<http://www.youtube.com/watch?v=ulw867aI2v4>.
- rrrr. FPM's copyrighted musical work "Fast Cut" is exploited on the following website: <http://www.youtube.com/watch?v=V8YQNTiAgxE>.
- ssss. FPM's copyrighted musical work "First Round Knockout" is exploited on the following websites: <http://www.youtube.com/watch?v=wd8cYzotrO0>;
<http://www.youtube.com/watch?v=bFZQrrZ-8vQ>;
<http://www.youtube.com/watch?v=NyZl5u7FNgY>;
<http://www.youtube.com/watch?v=P7I9lFWza6Y>;
<http://www.youtube.com/watch?v=qdGdp08uVqs>;
<http://www.youtube.com/watch?v=qz-mjNGAqLk>.
- tttt. FPM's copyrighted musical work "Power Punch" is exploited on the following websites: <http://www.youtube.com/watch?v=2lESxfkObFs>;

<http://www.youtube.com/watch?v=ZtJsDNKZc3g>;
<http://www.youtube.com/watch?v=hzBk3KEor9E>.

- uuuu. FPM's copyrighted musical work "Weird Trip" is exploited on the following websites: <http://www.youtube.com/watch?v=3bG-ZRUOQts>;
<http://www.youtube.com/watch?v=5-rvbgWUNds>;
<http://www.youtube.com/watch?v=UR8DcGsFMh8>;
<http://www.youtube.com/watch?v=VhYxklDFX-0>;
<http://www.youtube.com/watch?v=Qua9aG9JbbA>.

- vvvv. FPM's copyrighted musical work "Give Me the Ball" is exploited on the following website: http://www.youtube.com/watch?v=FbY_iJGecr0.

- www. FPM's copyrighted musical work "Pigskin Highlight" is exploited on the following websites: <http://www.youtube.com/watch?v=DFroVer8EOU>;
<http://www.youtube.com/watch?v=Qua9aG9JbbA>;
http://www.youtube.com/watch?v=bu_yN1GASMI;
<http://www.youtube.com/watch?v=dxakiaMOdnY>;
<http://www.youtube.com/watch?v=EiB1fQFOJmM>;
<http://www.youtube.com/watch?v=F4g6-z4fXgk>.

- xxxx. FPM's copyrighted musical work "Kick It Up" is exploited on the following website: <http://www.youtube.com/watch?v=qMCoQgFwFLI>.

- yyyy. FPM's copyrighted musical work "Steam" is exploited on the following websites: <http://www.youtube.com/watch?v=lgSmKDW5EY4>;
<http://www.youtube.com/watch?v=vIW5IcS7UKE>;
<http://www.youtube.com/watch?v=yhMCNdGzxBk>;
<http://www.youtube.com/watch?v=024kOphq4AE>;
<http://www.youtube.com/watch?v=4qays7NlkPY>;
<http://www.youtube.com/watch?v=DJB0HQytB6o>;
<http://www.youtube.com/watch?v=EzPvj-L0pRo>;
<http://www.youtube.com/watch?v=mJTyoYJKkA0>;
<http://www.youtube.com/watch?v=YvHJwg-U0F0>.

- zzzz. FPM's copyrighted musical work "Surf Avenue" is exploited on the following website: <http://www.youtube.com/watch?v=E8J4MiiNqr8>;
<http://www.youtube.com/watch?v=OmU7pHvIQw4>.

- aaaaa. FPM's copyrighted musical work "Against the Grain" is exploited on the following websites: <http://www.youtube.com/watch?v=0og805Mug3c>;
<http://www.youtube.com/watch?v=6lTjmGvFmg8>;
<http://www.youtube.com/watch?v=CpcBoU2RVG4>;
<http://www.youtube.com/watch?v=XJxxoRnupbI>;
<http://www.youtube.com/watch?v=Z3r-OHjowEk>.

- bbbbb. FPM's copyrighted musical work "Down and Dirty" is exploited on the following website: <http://www.youtube.com/watch?v=mBGe4ytBLSw>.

- cccc. FPM's copyrighted musical work "Mean Machine" is exploited on the following websites: <http://www.youtube.com/watch?v=6bBzF-qkpEI>;
<http://www.youtube.com/watch?v=8p7nd6yD428>;
<http://www.youtube.com/watch?v=9ic-Vb1NelU>;
<http://www.youtube.com/watch?v=DJB0HQytB6o>;
<http://www.youtube.com/watch?v=Kvfr3y7CvFU>;
<http://www.youtube.com/watch?v=LPNYKUdCzho>;
<http://www.youtube.com/watch?v=P5lQ3h0XykM>;
<http://www.youtube.com/watch?v=VPi-rIfGFcs>.
- dddd. FPM's copyrighted musical work "That Hurts" is exploited on the following websites: <http://www.youtube.com/watch?v=yhMCNdGzxBk>;
<http://www.youtube.com/watch?v=DJB0HQytB6o>;
<http://www.youtube.com/watch?v=21g2cqLVmTU>;
<http://www.youtube.com/watch?v=024kOphq4AE>;
<http://www.youtube.com/watch?v=AhUcqEsFcr0>.
- eeee. FPM's copyrighted musical work "Hit Squad" is exploited on the following websites: <http://www.youtube.com/watch?v=qOQRNcox2To>;
<http://www.youtube.com/watch?v=ulw867aI2v4>.
- ffff. FPM's copyrighted musical work "The Vanquished" is exploited on the following website: http://www.youtube.com/watch?v=FbY_iJGecr0.
- ggggg. FPM's copyrighted musical work "You Too As Well" is exploited on the following websites: <http://www.youtube.com/watch?v=6fBjvN-jQzw>;
<http://www.youtube.com/watch?v=k6CxHnXthFs>.
- hhhhh. FPM's copyrighted musical work "Downhill Blitz" is exploited on the following website: <http://www.youtube.com/watch?v=4HxgL3MPosg>.
- iiii. FPM's copyrighted musical work "Funk Button" is exploited on the following websites: <http://www.youtube.com/watch?v=Ypuq4bQhZRw>;
<http://www.youtube.com/watch?v=jHLHCHTlcO8>.
- jjjjj. FPM's copyrighted musical work "Breakaway" is exploited on the following websites: <http://www.youtube.com/watch?v=Cmzab3wbAa0>;
<http://www.youtube.com/watch?v=MPihmpWPlvk>;
<http://www.youtube.com/watch?v=PKelr4aFNAY>;
<http://www.youtube.com/watch?v=bzUzrtJPx84>;
<http://www.youtube.com/watch?v=kbdzRAvbusU>;
<http://www.youtube.com/watch?v=M9-M5RpflI8>;
<http://www.youtube.com/watch?v=sers-fL2NuU>.
- kkkkk. FPM's copyrighted musical work "Snowblind" is exploited on the following website: <http://www.youtube.com/watch?v=V8YQNTiAgxE>.

- lllll. FPM's copyrighted musical work "Desk Report" is exploited on the following websites: <http://www.youtube.com/watch?v=7BgcoYvbBcg>;
http://www.youtube.com/watch?v=987I_T9dkhg;
<http://www.youtube.com/watch?v=GRoG6oxT8Zo>;
http://www.youtube.com/watch?v=qf_udCXZnq4;
<http://www.youtube.com/watch?v=etdGWniA3Zg>;
<http://www.youtube.com/watch?v=n7IdsCIFEHk>;
<http://www.youtube.com/watch?v=hzBk3KEor9E>.
- mmmmm. FPM's copyrighted musical work "Fooling" is exploited on the following websites: <http://www.youtube.com/watch?v=PbVPn7QWR5E>;
<http://www.youtube.com/watch?v=PKEIr4aFNAY>;
<http://www.youtube.com/watch?v=YKGt6G1x4IE>;
<http://www.youtube.com/watch?v=HjRRl4QP5DI>;
http://www.youtube.com/watch?v=q2QtdTAIU_c.
- nnnnn. FPM's copyrighted musical work "Devil Ride" is exploited on the following websites: <http://www.youtube.com/watch?v=vIW5lcS7UKE>;
<http://www.youtube.com/watch?v=V6hmkMmghJM>;
<http://www.youtube.com/watch?v=JEW88XTrVso>;
<http://www.youtube.com/watch?v=e5PRDE38YhY>;
<http://www.youtube.com/watch?v=DGup9PCEzvK>;
<http://www.youtube.com/watch?v=43ggsmPO4mg>;
<http://www.youtube.com/watch?v=3iSwH9B93ts>;
http://www.youtube.com/watch?v=Fr_H6-sYIFQ.
- ooooo. FPM's copyrighted musical work "Coliseum" is exploited on the following websites: <http://www.youtube.com/watch?v=qdGdp08uVqs>;
http://www.youtube.com/watch?v=_ImrwnHpF8k;
<http://www.youtube.com/watch?v=vbgSuumN1wE>.
- ppppp. FPM's copyrighted musical work "Power Theme" is exploited on the following websites: <http://www.youtube.com/watch?v=IrtD1HeUMs>;
<http://www.youtube.com/watch?v=BLkXt1pHkgs>;
<http://www.youtube.com/watch?v=4HxgL3MPosg>.
- qqqqq. FPM's copyrighted musical work "Funky Dunky" is exploited on the following website: http://www.youtube.com/watch?v=-yayHrLT_TE.
- rrrrr. FPM's copyrighted musical work "Cappacino" is exploited on the following websites: <http://www.youtube.com/watch?v=0sAGD6S2Aek>;
<http://www.youtube.com/watch?v=eTHmFkkYOxY>;
http://www.youtube.com/watch?v=oD527c_IWw4.
- sssss. FPM's copyrighted musical work "Far Away" is exploited on the following website: <http://www.youtube.com/watch?v=1rf4avJYZKE>.

- ttttt. FPM's copyrighted musical work "Ocean Motion" is exploited on the following websites: <http://www.youtube.com/watch?v=IwIgiG75awM>;
<http://www.youtube.com/watch?v=tZTz28V2CyY>.
- uuuuu. FPM's copyrighted musical work "Straight From the Heart" is exploited on the following website: <http://www.youtube.com/watch?v=JE3Ev00MJJE>.
- vvvvv. FPM's copyrighted musical work "For the Gold" is exploited on the following website: <http://www.youtube.com/watch?v=pi8WJNcdmVM>.
- wwwww. FPM's copyrighted musical work "Gold" is exploited on the following website: http://www.youtube.com/watch?v=Fg_3wS92dTw.
- xxxxx. FPM's copyrighted musical work "The Opening" is exploited on the following website: <http://www.youtube.com/watch?v=OQESrTwMe60>.
- yyyyy. FPM's copyrighted musical work "Wings of the Wind" is exploited on the following website: <http://www.youtube.com/watch?v=F4g6-z4fXgk>.
- zzzzz. FPM's copyrighted musical work "Out in the Fields" is exploited on the following website: <http://www.youtube.com/watch?v=JE3Ev00MJJE>.
- aaaaa. FPM's copyrighted musical work "Quest" is exploited on the following websites: <http://www.youtube.com/watch?v=CMb-PV8M4s4>;
<http://www.youtube.com/watch?v=XVRJz0gspWQ>.
- bbbbb. FPM's copyrighted musical work "Determined Tumbao" is exploited on the following website: <http://www.youtube.com/watch?v=qJvTg-x0rMo>.
22. Upon information and belief, Defendant posted, or caused to be posted, the videos identified in paragraph 21.
23. Defendant did not receive a license to exploit FPM's Copyrighted Music in the manner set forth in paragraph 21.
24. Upon information and belief, Defendant copied and publicly performed FPM's Copyrighted Music through digital transmissions on the websites set forth in paragraph 21.
25. Upon information and belief, at all relevant times, Defendant maintained editorial control for content performed and/or copied on the websites set forth in paragraph 21.

26. FPM hired TuneSat, LLC (“TuneSat”), an online audio fingerprint technology and recognition service. TuneSat digitally detects music exploitation by searching across various platforms including hundreds of networks in countries around the world, including the United States, United Kingdom, Germany, France, Spain, and Italy. TuneSat works for various large music publishers, and has a database of tens of millions of songs.

27. TuneSat detected the use of FPM’s music set forth in paragraph 21. TuneSat contacted Defendant concerning the unauthorized use of FPM’s music.

28. Defendant has failed to acknowledge any wrongdoing and has forced FPM to bring the instant lawsuit.

Count I:
Copyright Infringement

29. FPM incorporates the allegations set forth in paragraphs 1 through 28 hereof, inclusive, as though the same were set forth herein.

30. This cause of action arises under 17 U.S.C. § 501.

31. Each of the FPM Copyrights has been registered with the United States Copyright Office.

32. FPM owns all exclusive rights under 17 U.S.C. § 106 to the FPM Copyrighted Music.

33. Each of the musical works covered by the FPM Copyrights is an original work and constitutes copyrightable subject matter within the meaning of 17 U.S.C. § 102.

34. FPM has never granted Defendant or otherwise authorized Defendant to exploit the musical works covered by the FPM Copyrights.

35. Defendant’s acts violate FPM’s exclusive rights under 17 U.S.C. §106.

36. Defendant's infringement of the FPM Copyrights is and has been willful, intentional, purposeful, and/or in disregard of FPM's rights.

37. FPM is entitled to its damages and Defendant's profits from the alleged infringement, in an amount to be proven at trial.

38. In the alternative, FPM is entitled to statutory damages, in an amount of up to \$150,000 per infringed copyright.

PRAYER FOR RELIEF

WHEREFORE, FPM respectfully prays for judgment against Defendant as follows:

- (a) for a ruling that Defendant has willfully infringed FPM's copyrights;
- (b) for injunctive relief prohibiting Defendant from exploiting the FPM Copyrighted Music;
- (c) for FPM's damages and, to the extent not duplicative, Defendant's profits attributable to the infringement;
- (d) in the alternative to actual damages, for statutory damages under 17 U.S.C. § 504(c), in an amount of up to \$150,000 per work;
- (e) for FPM's costs of this action, including reasonable attorneys' fees under 17 U.S.C. § 505;
- (f) for prejudgment and post judgment interest; and
- (g) for such other and further relief as the Court deems proper and just.

DEMAND FOR JURY TRIAL

FPM requests a trial by jury on all issues so triable.

Respectfully submitted,

BAKER & HOSTETLER LLP

Dated: February 23, 2017
New York, New York

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